

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Muhammad K. Abbasi	Debtor(s)	CHAPTER 13
Nationstar Mortgage LLC d/b/a Mr. Cooper	Movant	
vs.		NO. 20-13321 ELF
Muhammad K. Abbasi	Debtor(s)	
William C. Miller Esq.	Trustee	11 U.S.C. Section 362

**MOTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

1. Movant is Nationstar Mortgage LLC d/b/a Mr. Cooper.
2. Debtor(s) is the owner(s) of the premises 747 Clinton Avenue, Bensalem, PA 19020, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$206,186.00 on the mortgaged premises that was executed on September 2, 2016.

Mortgage Electronic Registration Systems, Inc., (MERS) as nominee for Seckel Capital, LLC to Nationstar Mortgage LLC d/b/a/ Mr Cooper dated 9/8/2020; recorded 9/17/2020. Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase order, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements in support of right to seek a lift of the automatic stay and foreclose if necessary.

4. William C. Miller Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. As of July 2, 2021, the total payoff on the mortgage is \$195,223.21.

7. Debtor(s) has failed to make the monthly post-petition mortgage payments in the amount of \$1,469.30 for the months of November 2020 through July 2021 with less of a suspense balance of \$1,465.10.
8. The total amount necessary to reinstate the loan post-petition is **\$11,758.60**.
9. Movant is entitled to relief from stay for cause.
10. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esq.

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